

EXHIBIT

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA COLLEGE
OF MEDICINE, a foreign corporation,

Plaintiff,

United States District Court Judge
Patrick J. Duggan, presiding
Michael Hluchaniuk, referral
Case No.: 2:10-cv-10978

V

STEVEN L. WOODWARD,

Defendant.

Eric A. Buikema (P58379) CARDELLI, LANFEAR & BUIKEMA, P.C. Attorneys for Plaintiff 322 W. Lincoln Royal Oak, MI 48067 (248) 544-1100 ebuikema@cardellilaw.com	STEVEN L. WOODWARD In Pro Per c/o 7211 Brittwood Lane Flint, MI 48507 Steve_L_woodward@yahoo.com
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PLAINTIFF'S INTERROGATORIES TO DEFENDANT

Plaintiff American University of Antigua College of Medicine, through counsel, pursuant to Fed. R. Civ. P. 33 submits the following interrogatories to Defendant to be answered fully and under oath. Pursuant to Fed. R. Civ. P. 33(a)(2), you have 30 days from being served to respond. Fed. R. Civ. P. 26(e) imposes a duty upon you to timely supplement your responses.

1. State your full name, address, social security number and driver's license number.

RESPONSE:

2. State your age, date, and place of birth.

RESPONSE:

3. Provide the address and dates of residence for every place you have resided in the last 10 years.

RESPONSE:

4. Employment History. Provide the name, address, telephone of every place where you have been employed in the last 15 years. Separately for each employer, provide your title, rate of compensation, dates of employment and the name of the person to whom you reported.

RESPONSE:

5. Please state the reasons and purpose for maintaining aua-med.com website.

RESPONSE:

6. Please state the reasons and purpose for maintaining the auastudentrights YouTube video Channel.

RESPONSE:

7. Please state all your defenses in this matter and their factual bases.

RESPONSE:

8. Have you ever been arrested for or convicted of a crime? If so, state
 - a. the nature of the arrest/conviction,
 - b. the date, and
 - c. the court and location.

RESPONSE:

9. Separately for each person who has knowledge of any fact relevant to this lawsuit, state:
 - a. The person's name, address, telephone number, employer address and employer telephone number;
 - b. The facts known to the witness;
 - c. The relationship of the witness to any party to this litigation, if any;
 - d. Produce all documents relating to this witness and/or his or her testimony, including statements, notes of conversations, memorandums, correspondence, reports, or any other records, written, electronic or otherwise.

RESPONSE:

10. Separately for every oral communication between plaintiff or anyone acting on its behalf and this defendant or anyone acting on its behalf relating to any fact relevant to this lawsuit:
 - a. State the substance of the communication;
 - b. State the date the communication occurred;
 - c. Identify by name, address, telephone number and employer all parties to the communication;
 - d. Produce all documents or records relating to or evidencing the communication.

RESPONSE:

11. Have you ever been party to a lawsuit before, including any bankruptcy proceeding, worker's compensation proceeding or divorce? If so, please provide

- a. the name of case including the names of parties, the state, county and court where it was filed, the year it was filed; and
- b. a brief description of the issue(s) in the case.

RESPONSE:

12. Have you ever been treated for a mental health condition or issue? If so, Please provide the name, address and telephone number for every mental health professional you have consulted, been examined by or seen in the last 10 years

RESPONSE:

/s/ Eric A. Buikema (P58379)
Eric A. Buikema (P58379)
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Dated: November 8, 2010